

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION; AMERICAN CIVIL
LIBERTIES UNION FOUNDATION OF
COLORADO;

Plaintiffs,

v.

UNITED STATES IMMIGRATION AND
CUSTOMS ENFORCEMENT,

Defendant.

**MOTION FOR ADMISSION
PRO HAC VICE**

Case No. 25-cv-3271-VEC

INTRODUCTION

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern Districts of New York, Timothy Macdonald hereby moves this Court for an Order for admission to practice Pro Hac Vice to appear as counsel for Plaintiff in the above-captioned action.

I am a member in good standing of the Supreme Court of the state of Colorado. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred, or denied admission or readmission by any court. I have attached an affidavit and certificate of good standing pursuant to Local Rule 1.3.

Dated this 25th day of April, 2025.

Respectfully submitted,

/s/ Timothy R. Macdonald

Timothy R. Macdonald

American Civil Liberties Foundation of Colorado

303 E. 17th Ave., Suite 350
Denver, CO 80203
Telephone: 303-777-5482
Email: tmacdonald@aclu-co.org